

2. In December 1996, BellSouth changed its service order writing procedures to show 9:00 PM in the FDT field on orders requiring coordination and to show the desired cutover time in the remarks section of the orders instead of in the FDT field. This change was made to prevent the automatic release of the disconnect order for existing service at the desired cutover time. This change provided flexibility for the manual coordination of cutovers without automatic service order processing. Without this change, the customer's existing service might be disconnected at the desired cutover time indicated in the FDT field even if any delays were encountered in the cutover process.

3. In December 1996, BellSouth corrected an error in LFACS. The error caused LFACS to fail to recognize that loop facilities on universal digital loop carriers could be reused in the provision of an unbundled loop. The effect of the correction was to eliminate delays resulting from manual assignment of loop facilities.

4. In December 1996, BellSouth enhanced its coordination of the installation of unbundled loops by assigning a project manager for coordination of ACSI's orders and by adopting the use of cutsheets, which collect all of the required data for efficiently processing cutovers.

The foregoing modifications are the only modifications since November 27, 1996, that relate to the problems encountered in BellSouth's provision of unbundled loops to ACSI in Columbus, Georgia, in November and December 1996.

**Response Provided by:** Brian Blanchard, Ken Ainsworth

**ACSI-13:** Please explain the meaning of each column on the document attached as Exhibit 6 to the Rebuttal testimony of Alphonso J. Varner, filed February 24, 1997 in Georgia PSC docket no. 6863-U, and identify all documents which form the basis for the information contained in that document. A copy of Varner Exhibit 6 is attached.

**Response:**

"PON#" means Purchase Order Number - The purchase order number is provided by ACSI on its orders for service.

"Date Rec." means Date Order Received by BellSouth - The date the order is received is logged by the EXACT system or is printed by the facsimile machine.

"Requested Service/Order Numbers" - The service requested on the Order by ACSI and BellSouth's Order Numbers to related to the service requested. The BellSouth Order numbers are generated by BellSouth's systems (SOCS/SOAC). The remarks section of ACSI's Orders or the EXACT system would detail the service being ordered.

"FDT" means Frame Due Time - The FDT was provided by ACSI on each of its Orders.

"FOC" means Firm Order Confirmation - The FOC was provided to ACSI upon release of an accurate Order into the BellSouth ordering systems.

"CDD" means Customer Due Date - The Customer Due Date was provided by ACSI on each of its Orders.

"Date Service Est." means Date Service Established - This date was provided by the BellSouth systems and central office technicians upon the completion of the service Order.

"OOS" means Out of Service - This is the amount of time between disconnection of the existing BellSouth service and the connection of the unbundled loop to ACSI.

"Pend." means Orders pending - The number of Orders which have been received by BellSouth from ACSI but have not been worked.

"Comp." means Orders completed - The number of Orders that have been completed by BellSouth.

The documents which form the basis for information contained in the referenced document have already been produced, will be produced pursuant to ACSI's document production requests, or have been identified elsewhere in these interrogatories.

**Response Provided by:** Eddie Owens

**ACSI-14:** With reference to paragraph 15 of the Answer, please explain in full the statement that "the service of several affected customers was disconnected due to a customer service representative's error." Without limiting the foregoing request, your answer should at a minimum identify which customers were affected by the alleged error, the duration of the service disconnection, the customer service representative that allegedly erred, the error that you allege occurred, and what actions BellSouth took to correct the alleged error.

**Response:** The error identified by BellSouth with reference to any of the orders in question is more properly described as an error by an RCMAG (Recent Change Administration Group) clerk. On December 5, 1996, Paula Murphy, a Supervisor in BellSouth's LCSC, called the RCMAG unit to request that the unit put a hold on an order to disconnect the existing service of Joseph Wiley (PON # I00047CMB) to prevent the system from automatically releasing the order prior to the installation of the unbundled loop. When the FDT arrived, the RCMAG clerk who reviewed the order released the order in error. The clerk's supervisor discussed the error with the clerk to reinforce the clerk's understanding of BellSouth's procedures.

**Response Provided by:** Ken Ainsworth

**ACSI-15:** Identify when BellSouth contends that it received ACSI service orders identified with Purchase Order Numbers ("PONs") I00042CMB, I00043CMB, I00044CMB, I00045CMB, I00047CMB, and identify all documents upon which BellSouth bases its claim concerning the date these orders were received.

**Response:** The original and subsequent versions of these orders were received as stated below. The sources of this information are documents produced by BellSouth and are indicated by their stamped numbers.

**PON I00042CMB**

- Received in EXACT from BDS Tellis on 11/13/96 (Copies will be produced on April 1.)
- FAXED: 11/15/96 (BellSouth Documents ##00024, 00025, 00026)
- FAXED: 11/18/96 (BellSouth Documents ##00021, 00022, 00023)
- FAXED: 11/18/96 (BellSouth Documents ##00027, 00028, 00029, 00021, 00022, 00023, 00024, 00025, 00031, 00032, 00033, 00034)
- FAXED: 11/14/96 (BellSouth Documents ##00018)
- FAXED: 11/15/96 (BellSouth Documents ##00020)
- FAXED: 11/15/96 (BellSouth Documents ##00019)
- FAXED: 11/20/96 (BellSouth Documents ##00030)

**PON I00043CMB**

- FAXED: 11/25/96 (BellSouth Documents ##00041, 00042, 00043)
- FAXED: 11/25/96 (BellSouth Document #00044)
- FAXED: 11/25/96 (BellSouth Document #00044)
- FAXED: 12/02/96 (BellSouth Documents ##00047, 00048, 00049)
- FAXED: 12/02/96 (BellSouth Documents ##00050, 00051, 00052, 00053, 00054)

**PON I00044CMB**

- FAXED: 11/25/96 (BellSouth Documents ##00065, 00066, 00067, 00068)
- FAXED: 11/25/96 (BellSouth Document #00069)

**PON I00045CMB**

- FAXED: 11/25/97 (BellSouth Documents ##00071, 00072, 00073, 00074)
- FAXED: 11/25/96 (BellSouth Documents ##00075, 00076)
- FAXED: 11/25/96 (BellSouth Documents ##00077, 00078, 00079)
- FAXED: 11/25/96 (BellSouth Documents ##00080, 00081)

**PON I00047CMB**

- FAXED: 12/02/96 (BellSouth Documents ##00083, 00084, 00085)

- FAXED: 12/02/96 (BellSouth Document #00086)
- FAXED: 12/04/96 (BellSouth Document #00087)
- FAXED: 12/04/96 (BellSouth Documents ##00088)
- FAXED MEMO: 12/5/96 (BellSouth Document #00171)
- FAXED: 12/11/97 (BellSouth Documents ##00093, 00094, 00095)
- FAXED: 12/11/96 (BellSouth Document #00092)
- FAXED: 12/11/97 (BellSouth Documents ##00093, 00094, 00095, 00096, 00097, 00098, 00099, 00100, 00101, 00102, 00105, 00106, 00107, 00108)

**Response Provided by:** Martha Jackson

**ACSI-16:** Does BellSouth contend that it requested a due date for PONs I0042CMB, I00043CMB, I00044CMB, I00045CMB, or I00047CMB other than that requested by ACSI in those orders? If so, for each PON that you claim BellSouth requested a different due date, identify the due date requested by ACSI, the due date requested by BellSouth, the person(s) that requested a change in the due date, the manner in which the request was made, the person(s) at ACSI to whom the request was communicated, the date upon which BellSouth first attempted to install the loops ordered in the PON, and all documents which form the basis for your answers.

**Response:** No.

**Response Provided by:** Martha Jackson

**ASCI-17:** For PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB, identify each date and time upon which BellSouth attempted to install the service requested by ACSI, what was done on each date and time, and the date and time upon which the service requested in the PON was established.

**Response:** See BellSouth Documents ## 00001 *et seq.* produced on March 17. The information in those documents was extracted from BellSouth's Work Force Administration (WFA) log and its service order records. Information about some attempts to install these services may have been lost due to the cancellation and reissue of orders. The following is a verbatim of that information, which has been extracted from the WFA log and the service order records and collated to show the events in chronological order:

PON I00042CMB	ASR 9631800030	ORD CO15PPD4
11/13/96	1008	Order Received in EXACT
11/13/96	1621	A57 passed expedite to Pam Jones in GA ISC
11/15/96	1017	KS1 Angie called for status. Checked TIRKS, not designed. Checked WFA Log 11-14 FAB Ticket and first level escalation. Called Pam in GA ISC, advised second level escalation. Pam advised if not designed by 1100 will 3rd level. Advised Angie. She will call back.
11/15/96	1215	A57 called Pam Jones and she got Barbara in CPG on line and she advised she is unable to design. She got Linda Anderson on line who is the person that is going to design model and Linda advised that she is going to look and design as quickly as possible. There is a problem and they are not sure what it is but they have escalated to Mary Fagan.



11/15/96 1239 A01 Pam Jones called. Advised circuit should have been installed yesterday. Customer very upset. Advised on Notes above. Designing circuit now. Will advise of DD when ICSC notifies ICSC. Customer advised will refer to Connie Conley @ 1130 if not heard from anyone. Referred to Barbara Jones @ 1035 to get circuit installed today. ICSC received ASR 0830 11/13/96.

11/15/96 1241 A57 called Pam Jones, advised working on this PON and verified what CFA's are and they are correct and I also advised her that I don't show anything spare on 80001 but she says entire TOTIE should be spare.

11/15/96 1517 A57 Order is wrong, NC code should be LZ-Z and should be GA @ the other LCSC and I passed her to Barbara Gene Warren who educated Pam Jones on how to send her order and give her the correct TN and their fax number because they are no line. I am going to cancel this PON.

**PON I00042CMB**

**ASR 9632000145**

**ORD COB96R02**

11/15/96 1638 Received order in EXACT.

11/15/96 Order input into SOCS with a Due Date of 11/18/96.

11/18/96 1207 Received order in WFA/C.

11/18/96 1403 Received Sup with corrected Tel. Nos. and change DD to 11/20/96. (Documentation SPNP request from Lisa Janders, ACSI.)

11/20/96 0909 6FS called IMP number and reached recording saying to leave a VMS which I did, requesting call back before 1500.

11/20/96 1243 6FS called IMP number again and reached David at ACSI who said he is at lunch and will call me back.

11/20/96	1304	6FS Per David McAdoo and Benny Mosier at ACSI, their dial tone is not ready yet and they want this put on hold.
11/20/96	1531	6FS Barbara Gene, Manage is bus ofc. spoke w/ACSI and they told her that this was still on for today. Said that have some translations problems and hope to resolve. She said they will call me. I sure hope they give us time to coordinate.
11/20/96	1600	6FS called RCMAG to touch base to see if any special person dedicated to ALEC orders and talked to Bernice who said no there was-n't. She checked the CRO orders and said that they had already flowed through.
11/20/96	1605	6FS talked to Ann McMillon and Lloyd Mize. It would appear the customer has been out of service since 11/19 at 1619.
11/20/96	1606	6FS called David at ACSI and told him I needed to know what was going on. He said that the cross connect has been made at the SLC but Juan still working on their switch but they were real close to being ready. David said he can't change DD but that a Pam Jones could.
11/20/96	1628	6FS handed off ticket to C.O. indicating IC customer was ready to work item 1 and item 2. Please call Melba before cutting.
11/20/96	1701	6FS Barbara Gene called saying that IC [ACSI] wanted to cut this. Dropped ticket to C.O. and called WMC [Work Management Center] to load.
11/20/96	1702	6FS Frank Thomas called saying that this is not a Toll cut. It will be a cut on the Frame. He got Bobbi on line on frame and she said she worked this yesterday.
11/20/96	1705	6FS called David at ACSI who said they still have problems and are not ready on this but he is real close and will call me back.

11/20/96	1822	6FS has not received call back from ACSI.
11/22/96	1008	Received Sup from Lisa Janders to change Due Date to 11/22/96. (Documentation SPNP request form.)
11/22/96	1829	6FS can't believe the IC called in here at 1645 to work on this. Anyway they did and I got into SMAS and pulled dial tone on both circuits. David called the new 243-0033 and 234-0034 numbers and they seem to be OK. However when you call the old 653-7062 and 7064 you reach a recording saying they are being checked for trouble.
11/27/96	1135	6FS posted order complete
<b>PON I00043CMB</b>	<b>ASR 9633000086</b>	<b>ORD COD35914</b>
11/25/96	1148	Order received via ASR FAX with a DDD of 11/27/96.
11/25/96	1356	Received Sup from ACSI to add FDT of 0900.
11/26/96	1628	Order received into WFA/C.
11/27/96	1355	6DL contacted Craig, ACSI, who requested call prior to cut.
11/27/96	1725	6DL contacted Diane, ACSI, advised problem, agreed to cut Monday 12/2/96.
11/27/96	1812	6DL contacted by Margaret, RCMAG, advised was disconnected in error, put back in service.
12/2/96	1559	6DL attempted cut, had assignment problems in C.O., advised Terri Hinson, ACSI, that we were cutting back. Had new pairs assigned and not reused.
12/2/96	1809	Received Sup from Lisa Janders, ACSI to change DD to 12/20/96.
12/17/96	1154	Order Canceled per WFA Log.

**PON I00043CMB****ASR 9633000086****ORD CO7P10V6**

1/6/97	1523	Order received in WFA/C.
1/6/97	1743	6FS did hand-off to C.O. advising them of 0900 cut and to call into conference bridge.
1/6/97	1825	6FS accessed TP and pulled dial tone from ACSI and ANAC'd [verified telephone number]. Number was 706-243-0035.
1/6/97	1830	6FS was told about cut after 1700 and was not able to set this up with RCMAG. Will come in at 0800 and try to get someone set up to work with RCMAG Supervisor John Coleman.
1/6/97	1923	6FS Per Glen Miller, they want us to ANAC our existing svc. Get on caprs [cable pairs] and pull dial tone from our switch and verify.
1/6/97	1933	6FS It is after hours and Frame has gone for the day. I also have no way to put ticket into CCC or Frame to get this done since my only way of HDC is from the GAS order.
1/6/97	1934	6FS has Supervisor Bernice Ford on line in GA CCC trying to explain this to her.
1/6/97	2014	6FS Bernice called back and advised Mr. Spencer will go to C.O. but it will be 1 hour before he gets there.
1/6/97	2049	6FS Spencer called and verified that the existing number is on the existing capr.
1/7/97	0854	6FS contacted Vince with ACSI verified release for cut. Was advise OK to cut.
1/7/97	0911	6FS Vince advised physical cut complete. Can test to End User. RCF in progress.
1/7/97	0927	6FS RCF complete and test verified to End User Janice Hodge.

1/7/97	0941	6FS Vince advised post test complete. Re- fused to accept. Did not want to do any post test verification.
1/7/97	0958	6FS posted complete.
<b>PON I00044CMB</b>	<b>ASR 9633000120</b>	<b>ORD COCCTRK8</b>
11/25/96	1257	Order received in EXACT with DD of 11/27/96 FDT of 1400.
11/25/96	1542	Order received in WFA/C.
11/27/96	0958	6FS is reviewing svc. [service] orders in- volved. This engineering did not use correct caprs on the order. I have input FAB ticket to correct this.
11/27/96	1132	6FS did hand-off to C.O. advising this is to be cut at 1400.
11/27/96	1212	6FS called C.O. and talked to Lewis who advised he has this wired.
11/27/96	1423	6FS and Charles on Frame began conversion. Discovered an assignment problem in RCMAG.
11/27/96	1457	6FS David McAdoo with ACSI on line.
11/27/96	1602	6FS contacted BellSouth Supervisor Ann McMillon who coordinated with Bernice in RCMAG to resolve discrepancy.
11/27/96	1611	6FS cut began.
11/27/97	1701	6FS Joe Craig in RCMAG advised RCF order is complete.
11/27/96	1714	6FS David McAdoo with ACSI accepted service.

**PON I00045CMB****ASR 9633000133****ORD COBTKWX8**

11/25/96	1257	Order received in EXACT with a DD 11/27/96.
11/25/96	1358	Received Sup to add FDT 1100.
11/25/96	1705	Order received in WFA/C.
11/27/96	1220	6DL contacted Craig with ACSI. We were not getting dial tone from his switch. He will check translations and call back.
11/27/96	1246	6DL was called by Craig with ACSI advised not call forwarding properly 706-320-9433.
11/27/96	1711	6DL contacted by Joe Craig advised that call forwarding problem resolved. Contacted Craig with ACSI and turned up for service.

**PON I00047CMB****ASR 9633800084****ORD CODKFQ06**

12/3/96	1844	Received order in EXACT with a DD of 12/4/96 FDT of 0900.
12/4/96	1027	Received Sup from Kelly Gallagher, ACSI to change DD to 12/5/97 FDT of 1400.
12/5/96	0937	Received Sup fro Lisa Janders, ACSI to change DD to 12/12/96.
12/11/96	1347	Received Sup from Kelly Gallagher, ACSI to change DD to 12/18/96.
12/11/96	1916	Received Sup from ACSI to change DD to 1/3/97.
12/21/96	1481	Received order in WFA/C.
12/31/96	1058	6DL contacted Blane at ACSI to verify DD for cut. Blane advised can't cut until DD.
12/31/96	1106	6DL Blane says we can call whenever ready to cut this.
12/31/96	1222	6DL Blane says OK to cut this at 1430 today.

12/31/96	1433	6DL Cut complete on Frame. Numbers being ANAC'd.
12/31/96	1440	6DL completed order to Blane
12/31/96	1441	6DL competed order in WFA/C.

Following are definitions of acronyms and abbreviations used in the foregoing:

A57, KS1, A01, 6FS, 6DL - Owner Code for Technicians working on, or commenting on ticket status.

ANAC - Automatic Number Announcement Circuit

ASR - Access Service Requirement

C.O. - Central Office

CCC - Hand-off should always be dispatch in with a center type of "ccc". (Such as GACCC)

CFA - Connection Facility Assignment

CPG - Circuit Provisioning Group.

CRO - Complete with Related Order

DD - Due date

DDD - Desired Due Date

FAB - Field Assistance Bureau, group responsible for Local Cable Pair maintenance and provisioning change coordination.

FDT - Frame Due Time. When order will be input to the switch translations.

GAS - Georgia Special Order

HDC - Status Narrative ("dispatched in")

ICSC - Interexchange Customer Service

ISC - InterSystems Coupling (TEAM).

LZ - Service Code for Unbundled Loop

NC - Network Channel

ORD - Order

PON - Purchase Order Number

RCF - Remote Call Forward

RCMAG - Recent Change Administrative Group

SPNP - Service Provider Number Portability

Sup. - Short for Supplementary change to an order.

T0TIE - DS0 Level Connection (1 channel)

TN - Telephone Number

TP - Test Point for Switched Maintenance Access System (SMAS).

VMS - Voice Mail System

**Response Provided by:** Kenneth L. Ainsworth



**ACSI-18:** For PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB, identify the date and time upon which BellSouth claims the installation was completed and all documents upon which you rely for this claim.

**Response:** See Response to ACSI-17.

**Response Provided by:** Kenneth L. Ainsworth

**ACSI 19:** To the extent that final installation of any of the orders identified with PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB was delayed, state each and every reason that BellSouth claims contributed to or caused the delay. To the extent your answer refers to an action allegedly taken or failed to be taken by ACSI, identify the action taken or failed to be taken, the ACSI employee (if any) that took or should have taken the action, the date and time the action occurred or should have occurred, and, in the case of an alleged failure to act, the date and time upon which the action allegedly did occur.

**Response:** See Responses to ACSI-12, ACSI-15 and ACSI-17, the documents referenced in the Responses to ACSI-15, ACSI-17, and BellSouth Documents ##00566-00704.

In addition to the ACSI failures or actions indicated in those responses and documents, the ACSI collocated frame termination in BellSouth's Columbus Main Central Office was labeled (stenciled) as "Cable" and "Pair" instead of "TOTIE." ACSI's vendor responsible for installation and stenciling of the frame, which was previously used equipment, had failed to restencil the frame for its new use. The effect of this failure to make it impossible for BellSouth to find the correct ACSI facility termination for connection of ACSI's unbundled loops. In other words, when ACSI issued an order to BellSouth, the order specified the location on the frame at which BellSouth should connect the unbundled loop. The stenciling on the frame did not match the assignment information provided by ACSI. Thus, circuit continuity could not be established between BellSouth's unbundled loops and ACSI's facilities.

The following timeline prepared by BellSouth Specialist Brian Blanchard describes how BellSouth discovered this problem and the extraordinary steps that BellSouth took to help ACSI correct the problem:

**December 12, 1996** - I was contacted by Ken Ainsworth to help determine a provisioning problem with ACSI collocation in Columbus. After looking at several orders and talking over the phone to central office technician, Ken asked me to visit the Columbus central office to determine what the actual problem was.

**December 13, 1996** - I went to the Columbus Central office and inspected the ACSI collocation arrangement. The frame termination was labeled as Cable and Pair instead of TOTIE. The central office and ACSI were guessing in an attempt to determine a common scheme. This common scheme was only working with pairs below 96. The frame block terminations were labeled as Cable 1-96, 101-196, 201-296 and 301-396. The central office technician and I tested the first and last channel on each shelf to determine whether the equipment was wired correctly to the frame. I left yellow POST-IT® notes on the frame block terminations with the correct TOTIE designation so that the installation vendor could relabel the frame blocks. With these POST-IT® notes the central office technicians could also wire all future orders to the correct termination.

**December 14, 1996** - I participated in a conference call to process service orders and discuss collocation issues for ACSI at Columbus. Determined that Ken Ainsworth and I would talk to Pam Jones at ACSI about the TOTIE assignments.

**December 16-19, 1996** - I developed drawings detailing the collocation arrangement and how to read the DLRs. I faxed these drawings to Pam Jones and discussed how to associate the TOTIE carriers to the slot and port on the equipment. After these discussions, I agreed that BellSouth would provide additional notes on the DLR to determine that TOTIE carrier systems have two channels. I had the program that generates the TIE carrier systems updated to include these notes. The Georgia Circuit Provisioning Group added these notes to the TOTIE carrier system DLRs and mailed them to ACSI. (See documents ## 00813-00817, to be produced on April 1.)

BellSouth has subsequently found similar stenciling errors on ACSI's equipment in Louisville, Kentucky, Montgomery, Alabama, and Birmingham, Alabama.

**Response Provided by:** Brian Blanchard and Ken Ainsworth

**ACSI 20:** Please identify all actions, if any, BellSouth took in response to PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB, to coordinate with ACSI the cutover of these customers to ACSI unbundled loops. For each action BellSouth took, your answer should, at a minimum, identify precisely what action was undertaken, the person(s) at BellSouth that took the action, the person(s) (if any) at ACSI that BellSouth contacted, the outcome of the action, and all persons at BellSouth with knowledge of the action taken.

**Response:** See Response to ACSI-15, ACSI-17, and ACSI-19.

**Response Provided by:** Brian Blanchard, Ken Ainsworth, Eddie Owens, Martha Jackson

**ACSI 21:** Please identify all routine reports BellSouth prepares or has prepared on its behalf which refer, identify or relate to the status of orders its receives for the installation, maintenance, or repair of unbundled loops provided by BellSouth, and identify all documents which are, refer to, include, or otherwise relate to any routine reports created during or referring to the period between November 1, 1996 and January 6, 1997.

**Response:** BellSouth does not produce such routine reports, but has produced the report provided on March 17 as BellSouth Documents ## 00001 *et seq.*

**Response Provided by:** Kenneth L. Ainsworth

**ACSI 22:** State the installation interval, as measured from the date upon which BellSouth receives the order to the date of customer delivery, that BellSouth provides services to its own customers, as is referred to in Section IV.D.1 of the Interconnection Agreement, and identify all documents which measure, report, or refer to this interval (including without limitation, all documents upon which BellSouth relies in responding to this interrogatory). If the installation intervals vary for different types of orders, identify each order type and state the installation interval for each.

**Response:** Installation intervals for exchange services provided to BellSouth's business and residential customers are individually determined based on factors such as the availability of facilities, access to customers' premises and equipment rooms, conduit, electrical power or ground, space on backboards or equipment racks, and work force at the time the order is received. Installation intervals for private line and special access services are based on Customer Desired Due Date, subject to the same factors.

**Response Provided by:** Kenneth L. Ainsworth

**ACSI 23:** State the installation and service intervals that BellSouth provides for network elements for use by itself, its affiliates or its own retail customers as is referred to in Section IV.E.3 of the Interconnection Agreement, and identify all documents which measure, report, or refer to these intervals (including without limitation, all documents which BellSouth relies in responding to this interrogatory). If the installation and service intervals vary, identify each different category and state the installation and service intervals for each.

**Response:** BellSouth has not established installation and service intervals for the provisioning of individual network components used to provide exchange or exchange access services for use by itself, its affiliates, or its retail customers.

**Response Provided by:** Kenneth L. Ainsworth

**ACSI 24:** State each measurement of the service quality of leased network elements when BellSouth uses those elements for its own purposes and identify all documents which measure, report, or refer to each measurement (including without limitation all documents upon which BellSouth relies in answering this interrogatory). If your answer varies by element, identify each different category and provide measurements for each.

**Response:** BellSouth does not understand what is meant by "leased network elements" in this context.

**Response Provided by:** Kenneth L. Ainsworth



**ACSI 25:** State how the installation intervals, service intervals, and service quality, as referred to in Sections IV.D.1, IV.E.1, and IV.E.3 of the Interconnection Agreement, compare to that which BellSouth provided to ACSI before January 6, 1997 and identify all documents which measure, report, or refer to BellSouth's performance with respect to ACSI.

**Response:** See BellSouth Documents ## 00001 *et seq.* At all times before and since January 6, 1997, BellSouth's objective has been to provide network elements on the due dates requested by ACSI, subject to the factors described in the Response to ACSI-22 and to provide a level of quality equivalent to that provided to BellSouth's retail customers. Information provided in response to previous interrogatories demonstrates the extent to which BellSouth has met or failed to meet these objectives.

**Response Provided by:** Joan Bryant